



PELTON GRAHAM LLC

ADVOCATES FOR JUSTICE

July 23, 2025

Brent E. Pelton, Esq.
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VIA CM/ECF

Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square, Room 619
New York, New York 10007

Re: *Ballast, et al. v. Workforce7 Inc., et al.*
Civil Action No.: 20-CV-03812 (ER)

Dear Judge Ramos:

MEMO ENDORSED

The request is granted. Plaintiffs' deadline to file their Reply to the Motion for Class Certification is August 11, 2025.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: July 23, 2025

New York, New York

This office represents the plaintiffs in the above-referenced action. We write, with the consent of counsel for Consolidated Edison Company of New York, Inc. ("Con Edison"), to respectfully request an extension of Plaintiffs' deadline to file their Reply to Plaintiffs' Motion for Class Certification.

On May 21, 2025, the Court entered a Revised Civil Case Discovery Plan and Scheduling Order setting Plaintiffs' deadline to file their Motion for Class Certification as June 6, 2025, the deadline for Con Edison's opposition as July 14, 2025, and the deadline for Plaintiffs' reply as July 28, 2025. (Dkt. No. 361). Pursuant to the Court's scheduling order, Plaintiffs subsequently filed their Motion for Class Certification on June 6, 2025 (Dkt. Nos. 364-66), and Defendant Con Edison filed its Opposition to Plaintiffs' Motion on July 14, 2025. (Dkt. Nos. 374-78). The extension for Plaintiffs' deadline to submit their Reply is necessary due to competing deadlines in other matters and scheduling constraints due in part to Plaintiffs' counsel's travel commitments. Thus, Plaintiffs respectfully request a two (2)-week extension of their deadline to file their reply, to August 11, 2025. This is the parties' first request for the extension of this deadline, and it is made with the consent of Con Edison.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Brent E. Pelton

Brent E. Pelton, Esq. of
PELTON GRAHAM LLC

Enclosure

cc: All Counsel (via CM/ECF)